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FILE NO: 11301/25

DATE:

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PAGES (INCLUDING COVER PAGE):

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CLIENT-

MATTER:

11301-25

To:

Mr. Charles Terreni - Chief Clerk

FIRM:

South Carolina Public Service Commission

FAX:

803-896-5199

Main No.:

803-896-5100

FROM:

Scott H. DeBroff, Esquire

E-MAIL:

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#### Comments:

Attached please find the "Request for Information Only Status on Behalf of Elster Integrated Solutions" to be filed in Case 2008-447-E.

SHD/msi

RECHID

MAIL / DAIS

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN RE: PETITION TO ESTABLISH DOCKET TO CONSIDER IMPLEMENTING THE REQUIREMENTS OF:

SECTION 1307 (STATE CONSIDERATION OF SMART GRID) OF THE ENERGY INDEPENDENCE & SECURITY ACT OF 2007

DOCKET NO. 2008-447-E

# REQUEST FOR INFORMATION ONLY STATUS ON BEHALF OF ELSTER INTEGRATED SOLUTIONS

SCOTT H. DEBROFF, ESQUIRE ALICIA R. PETERSEN, ESQUIRE RHOADS & SINON LLP ONE SOUTH MARKET SQUARE P.O. BOX 1146 HARRISBURG, PA 17108-1146

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APETERSEN@RHOADS-SINON.COM

DATED: FEBRUARY 27, 2009 COUNSEL FOR ELSTER INTEGRATED SOLUTIONS, INC.

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN RE: PETITION TO ESTABLISH DOCKET TO CONSIDER IMPLEMENTING THE REQUIREMENTS OF:

SECTION 1307 (STATE CONSIDERATION OF SMART GRID) OF THE ENERGY INDEPENDENCE & SECURITY ACT OF 2007

DOCKET NO. 2008-447-E

### REQUEST FOR INFORMATION ONLY STATUS ON BEHALF OF ELSTER INTEGRATED SOLUTIONS

AND NOW COMES Elster Integrated Solutions ("Elster") by and through its counsel, Scott H. DeBroff, Esquire and Alicia R. Petersen, Esquire of Rhoads & Sinon LLP, for the purpose of this "Request of Notification" with respect to this proceeding before the Public Service Commission of South Carolina ("PSC" or the "Commission") and avers the following:

1. Elster, with its headquarters in Raleigh, North Carolina and operations in 22 countries, serving customers in over 70 countries, is a leading provider of Advanced Metering Infrastructure (AMI) solutions that help utility companies improve revenue cycle services, customer service, delivery reliability, and workforce utilization. With more than 100 years of electricity metering experience (formerly as Westinghouse Electric Corporation and ABB Electricity Metering), Elster understands the unique requirements of utility customers worldwide.

- 2. Elster provides open standards-based network solutions to utilities for advanced metering infrastructure (AMI), demand response, and grid management. Its solutions enable utilities to better serve their customers, develop new revenue sources, and reduce overall expenses.
- 3. Elster has been involved in EISA 2007 proceedings in other states and also was extensively involved in related proceedings, like the EPACT 2005 proceedings across the country before other state public utility commissions. Our interest in intervening in this proceeding is to inform and educate the Commission on the issues of Smart Grid Investments and Smart Grid information and their value to both utilities and customers.
- 4. Elster has a substantial and bona fide interest in the subject matter of this docket.
- 5. Elster filed a letter to receive information and give testimony at the Hearing as a non-party on January 20, 2009. This letter is attached to this document as Exhibit A.
- 6. Elster respectfully requests for its above named counsel to also be notified of the hearing in this case and be placed on the Commission's Official Service List for this docket.
- 7. Elster does not wish at this time to intervene as a formal party in this proceeding. However, Elster would like to be able to receive all of the docket filings made in this proceeding as it moves forward, and if it desires, to file for formal party status with this Commission at some later point in the proceeding.

- 8. As such Elster requests "Information Only" status today and respectfully requests that the Commission preserve its right to intervene as a Formal Party at a later date.
- 9. Elster's counsel and to whom all correspondence and pleadings in this docket should be directed to are:

SCOTT H. DEBROFF, ESQUIRE (MAIN CONTACT PERSON) RHOADS & SINON LLP ONE SOUTH MARKET SQUARE P.O. BOX 1146 HARRISBURG, PA 17108-1146

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EMAIL: SDEBROFF@RHOADS-SINON.COM

**ED GRAY** 

ELSTER INTEGRATED SOLUTIONS VP OF REGULATORY AFFAIRS 706 BRANNOCK TERRACE ANNAPOLIS, MD 21401

TEL: (443) 433-8080

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EMAIL: APETERSEN@RHOADS-SINON.COM

WHEREFORE, Elster respectfully requests that the Public Service Commission of South Carolina note Elster's intent to be notified of the hearing in the above captioned investigation. We look forward to participating in the process going forward and contributing our experience and expertise.

Respectfully submitted,

Dated: February 27, 2009

By:

SCOTT H. DEBROFF, ESQUIRE ALICIA R. PETERSEN, ESQUIRE

RHOADS & SINON LLP

ONE SOUTH MARKET SQUARE

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COUNSEL FOR ELSTER INTEGRATED SOLUTIONS

### Exhibit A



January 15, 2009

Public Service Commission of South Carolina Office of the Regulatory Staff 1401 Main Street, Suite 900 Attn: Docketing Department Post Office Drawer 11649 Columbia, South Carolina 29211

In the matter of a Docket to Fulfill the State Requirements of the Energy Independence & Security Act of 2007 DOCKET NO. 2008-447-E

#### Dear Sirs:

As provided for in the NOTICE OF FILING dated December 23, 2008 I would like to testify at the hearing, when scheduled. I anticipate my comments would take 15 minutes. I do not wish to intervene in this proceeding. Please notify me of the hearing date, time,

Thanks for your consideration.

Very truly yours,

Ed Gray

Vice President of Regulatory Affairs

Elster Integrated Solutions

706 Brannock Terrace

Annapolis, MD 21401

ed.gray@us.elster.com

443-433-8080

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN RE: PETITION TO ESTABLISH DOCKET TO CONSIDER IMPLEMENTING THE REQUIREMENTS OF:

SECTION 1307 (STATE CONSIDERATION OF SMART GRID) OF THE ENERGY INDEPENDENCE & SECURITY ACT OF 2007

DOCKET NO. 2008-447-E

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "REQUEST FOR INFORMATION ONLY STATUS ON BEHALF OF ELSTER INTEGRATED SOLUTIONS" was served on the Public Service Commission of South Carolina along with the service list on this 27<sup>th</sup> day of February, 2009.

Respectfully submitted,

By:

SCOTT H. DEBROFF, ESQUIRE ALICIA R. PETERSEN, ESQUIRE RHOADS & SINON LLP ONE SOUTH MARKET SQUARE P.O. BOX 1146 HARRISBURG, PA 17108-1146

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EMAIL: <u>SDEBROFF@RHOADS-SINON.COM</u> EMAIL: <u>APETERSEN@RHOADS-SINON.COM</u>

DATED: FEBRUARY 27, 2009

Counsel for Elster Integrated Solutions